

## REMARKS

This is a full and timely response to the outstanding non-final Office Action mailed July 24, 2006. Reconsideration and allowance of the application and pending claims are respectfully requested.

### **I. Claim Rejections - 35 U.S.C. § 102(e)**

Claims 1-4, 8, 11, 18, 21, 24, and 29 have been rejected under 35 U.S.C. §102(e) as being anticipated by *Cronch* (U.S. Patent No. 6,954,278). Applicant respectfully traverses this rejection.

It is axiomatic that "[a]nticipation requires the disclosure in a single prior art reference of each element of the claim under consideration." *W. L. Gore & Associates, Inc. v. Garlock, Inc.*, 721 F.2d 1540, 1554, 220 USPQ 303, 313 (Fed. Cir. 1983). Therefore, every claimed feature of the claimed subject matter must be represented in the applied reference to constitute a proper rejection under 35 U.S.C. §102(e). In the present case, not every feature of the claimed subject matter is represented in the *Cronch* reference. Applicant discusses the *Cronch* reference and Applicant's claims in the following.

Applicant's independent claim 1 provides as follows:

1. A method for facilitating generation of a hard copy, comprising:
  - selecting a document file written in a first language;
  - selecting a translator file configured to translate the document file into a second language of specialized commands of specialized commands for a hard copy generation device, the specialized commands enabling a hard copy of the document file to be produced at the hard copy generation device;*** and
  - packaging the document file and the translator file together in a job package that can be received by the hard copy generation device.***

(Emphasis added).

*Cronch* describes a method of downloading an operating system to a printer if the printer operating system does not correspond to data format of a print job to be printed at the printer. See abstract. As such, *Cronch* does not teach or suggest translation of a document file (that is to be produced as a hard copy) into a second language used by a hard copy generation device. Rather, *Cronch* seemingly teaches that an operating system is downloaded to a printer that understands the native language of the document file. Therefore, translation would not seemingly be needed in *Cronch*.

Further, for sake of argument if the operating system in *Cronch* is construed as a translator file, *Cronch* fails to teach or suggest that the document file (that is to be produced as a hard copy) is packaged with the operating system in a job package that is received by the printer.

For at least these reasons, *Cronch* does not teach or suggest “selecting a translator file configured to translate the document file into a second language of specialized commands of specialized commands for a hard copy generation device, the specialized commands enabling a hard copy of the document file to be produced at the hard copy generation device; and packaging the document file and the translator file together in a job package that can be received by the hard copy generation device,” as recited in claim 1.

As a result, *Cronch* does not teach or suggest at least all of the claimed features of claim 1. Therefore, claim 1 is not anticipated by *Cronch*, and the rejection should be withdrawn for at least this reason alone.

In view of the foregoing, Applicant respectfully asserts that *Cronch* does not teach or suggest Applicant's independent claims 1, 8, 11, 18, 21, and 24 and claims 2-4 and 29 which respectively depend therefrom. Therefore, Applicant respectfully requests that the rejections of these claims be withdrawn.

## **II. Claim Rejections - 35 U.S.C. § 103(a)**

Claims 5, 16, 17, 22, and 25-27 have been rejected under 35 U.S.C. § 103(a) as being unpatentable over *Cronch* in view of *Vidyanand* (U.S. Patent No. 6,967,728). Claims 6, 7, 9, 10, 12-15, 19, 20, 23, 28, 30, and 32 have been rejected under 35 U.S.C. § 103(a) as being unpatentable over *Cronch* in view of *Vidyanand* in further view of *Adamske* (U.S. Patent No. 6,615,234). Claim 31 has been rejected under 35 U.S.C. § 103(a) as being unpatentable over *Cronch* in view of *Vidyanand* in further view of *Nakamura* (U.S. Patent No. 6,064, 836). Applicant respectfully traverses these rejections.

*Cronch* in view of *Vidyanand* is similarly deficient as to Applicant's independent claims 8, 11, 18, 21, and 24. In particular, *Vidyanand* describes a method for transmitting printer driver preferences across a network. In *Vidyanand*, printer preferences for use at a first printer may be transferred between client computers so that the printer preferences may be used with a second printer, where the printer preferences are modified, as needed, based on the feature set of the second printer. See cols. 8-9, lines 59-2. To transfer a set of printer preferences, a user can select to export the set, import a set, etc., as shown by Fig. 10. As such, *Vidyanand* does not remedy the deficiencies of the *Cronch* reference with regard to the independent claims. For example, *Vidyanand* does not teach or suggest packaging a document file (that is to be

produced as a hard copy) with a translator file in a job package that is received by the printer. For sake of argument if the printer preferences set in *Vidyanand* is construed as a translator file, *Vidyanand* fails to teach or suggest that the document file (that is to be produced as a hard copy) is packaged with the printer preferences set in a job package that is received by the printer.

In view of the foregoing, Applicant respectfully asserts that *Cronch* in view of *Vidyanand* does not teach or suggest the features of claims 5, 16, 17, 22, and 25-27 which depend from independent claims 1, 11, 21, and 24. Therefore, Applicant respectfully requests that the rejections of these claims be withdrawn.

Additionally and notwithstanding the foregoing reasons for the allowability of claims 5, 16, 17, 22, and 25-27, these dependent claims recite further features and/or combinations of features (as is apparent by examination of the claims themselves) that are patentably distinct from the cited art of record. Hence, there are other reasons why these dependent claims are allowable.

Further, the proposed combination of *Cronch* in view of *Vidyanand* in further view of *Adamske* fails to teach or suggest the features of claims 6, 7, 9, 10, 12-15, 19, 20, 23, 28, 30, and 32 which depend from independent claims 1, 8, 11, 18, and 21. Likewise, the proposed combination of *Cronch* in view of *Vidyanand* in further view of *Nakamura* fails to teach all of the features of claim 31 which depends from independent claim 11. Therefore, Applicant respectfully requests that the rejections of these claims be withdrawn.

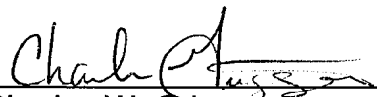
Additionally and notwithstanding the foregoing reasons for the allowability of claims 6, 7, 9, 10, 12-15, 19, 20, 23, 28, and 30-32, these

dependent claims recite further features and/or combinations of features (as is apparent by examination of the claims themselves) that are patentably distinct from the cited art of record. Hence, there are other reasons why these dependent claims are allowable.

### **CONCLUSION**

Applicant respectfully submits that Applicant's pending claims are in condition for allowance. Favorable reconsideration and allowance of the present application and all pending claims are hereby courteously requested. If, in the opinion of the Examiner, a telephonic conference would expedite the examination of this matter, the Examiner is invited to call the undersigned attorney at (770) 933-9500.

Respectfully submitted,

  
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Charles W. Griggers  
Registration No. 47,283